

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
National Exchange Carrier Association)	WC Docket No. 04-259
Petition to Amend Section 69.104 of the)	
Commission's Rules)	RM-10603

JOINT MOTION FOR EXTENSION OF TIME

BellSouth, SBC, and Verizon,¹ pursuant to Section 1.46 of the rules of the Federal Communications Commission ("Commission"), respectfully request a modification to the comment schedule which was published in the Federal Register dated Friday, August 13, 2004.² Movants seek additional time to submit cost data and complete the analyses sought by the Commission in order to resolve the issues raised in the *Notice of Proposed Rulemaking* ("NPRM") released on July 19, 2004.³ In particular, movants seek to extend the comment date from October 12 to November 12, 2004 and the reply date from November 12 to December 12, 2004.

The NPRM sets forth to examine the proper number of Subscriber Line Charges ("SLCs") that carriers may assess upon customers that obtain derived channel T-1 service where the customer provides the terminating channelization equipment, including Primary Rate Interface ("PRI") Integrated Services Digital Network ("ISDN") service. In particular, the Commission recognized a need to gather information on the cost of provisioning these services;

¹ The Verizon telephone companies ("Verizon") are the local exchange carriers affiliated with Verizon Communications Inc.

² 69 Fed. Reg. 50141 (2004). The Order and NPRM released on July 19, 2004, stated that the comment cycle would be 60 and 90 days after publication in the Federal Register. *See* National Exchange Carrier Association Petition to Amend Section 69.104 of the Commission's Rules, WC Docket No. 04-259, RM-10603, Order Granting Petition for Rulemaking, Notice of Proposed Rulemaking, and Order Granting Interim Partial Waiver, 19 FCC Rcd 13591 (2004) (*NPRM*).

³ *Id.*

and therefore, the Commission requested cost studies to determine the actual common line cost relationship between these services and basic analog service, including all underlying data, all assumptions, formulas, etc. In addition, the Commission requests that commenters assess the impact of different network architectures, including different loop costs; the impact on interstate common line support universal service fund (“ICLS”) and other universal service issues; the impact on Presubscribed Interexchange Carrier Charge (“PICC”), Carrier Common Line Charge (“CCLC”), and retail rates; and the cost and methodologies used to determine line port charges.

The Commission’s order will require the commenters to develop detailed cost data and revenue impacts for a variety of T-1 based services. While an accurate and in depth data presentation is clearly beneficial to an orderly review of the issues raised in the NPRM, commenters must expend significant time and resources to gather, analyze and present meaningful data. Based on their experience, movants believe that thirty days is the minimum time needed to provide the information necessary to facilitate a proper review of the SLC application. By providing additional time to gather and prepare these data, the Commission would ensure a more complete record and give all parties an opportunity to supply the necessary data and comment on the issues presented. Moreover, by providing additional time to allow the commenters to include such analyses in their initial comments, the Commission will ensure more meaningful reply comments.

Based on the effort already expended by the movants to respond to the data requests in the NPRM, the movants believe that an additional 30 days is necessary to prepare a complete submission to the questions raised by the Commission. Allowing an additional month to gather information would promote fact-based decision making and would be far more likely to speed the resolution of the issues in the NPRM. An extension would facilitate speedier resolution by avoiding piecemeal submissions of data and arguments. For these reasons, the Commission should allow an additional 30 days for initial comments and schedule reply comments for 30 days thereafter.

CONCLUSION

For the reasons set forth in this motion, the dates for submission of comment and reply dates should be modified to November 12 and December 12, 2004, respectively.

Respectfully submitted,

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